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Attorney for Defendant  
IMRAN HUSAIN

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IMRAN HUSAIN,

Defendant.

Case No.: CR 14-149-RS

STIPULATION TO CONTINUE  
STATUS CONFERENCE  
REGARDING EXCLUDABLE TIME  
PERIODS UNDER SPEEDY TRIAL  
ACT; ~~PROPOSED ORDER~~

IT IS HEREBY STIPULATED by and between defendant, Imran Husain,  
by and through his counsel of record, Victor Sherman, and plaintiff, United States  
of America, by and through its counsel of record, Benjamin Kingsley, hereby  
stipulate as follows:

1. By previous order, this matter was set for status on June 24, 2014 at  
2:30 p.m.
2. By this Stipulation, the parties now move to continue the status  
conference until August 12, 2014 at 2:30 p.m. and to exclude time  
between June 24, 2014 and August 12, 2014, under 18 U.S.C.  
§3161(h)(7)(A); B(iv).

- 1           3.     The parties agree and stipulate and request that the Court find the  
2           following:
- 3           a.     The government has represented that the initial discovery has  
4           been provided and is continuing to prepare additional discovery  
5           in this matter. Discovery is ongoing at this time, but is not  
6           complete.
- 7           b.     Defense counsel, Victor Sherman, is unavailable during the  
8           month of July as he is scheduled to be in a trial starting July 1,  
9           2014 and expected to go the entire month.
- 10          c.     Counsel for the defendant needs additional time for  
11          investigation and preparation. Counsel for defendant is  
12          continuing to investigate the matter. Counsel for defendant  
13          believes that failure to grant the above-requested continuance  
14          would deny them the reasonable time necessary for effective  
15          preparation and resolution, taking into account the exercise of  
16          due diligence.
- 17          d.     The government does not object to the continuance and agrees  
18          a continuance is necessary due to the ongoing voluminous  
19          discovery review.
- 20          e.     Based on the above-stated findings, the ends of justice served  
21          by continuing the case as requested outweigh the interest of the  
22          public and the defendant in a trial within the original date  
23          prescribed by the Speedy Trial Act.
- 24          f.     For the purpose of computing time under the Speedy Trial Act,  
25          18 U.S.C. §3161, et seq., within which trial must commence,  
26          the time period of June 24, 2014 to August 12, 2014, inclusive,  
27          is deemed excludable pursuant to 18 U.S.C. §316(h)(7)(A),  
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1 B(iv) because it results from a continuance granted by the  
2 Court at defendant's request on the basis of the Court's  
3 findings that the ends of justice served by taking such action  
4 outweigh the best interest of the public and the defendant's  
5 interest in a speedy trial.

- 6 4. Nothing in this Stipulation and Order shall preclude a finding that  
7 other provisions of the Speedy Trial Act dictate that additional time  
8 periods are excludable from the period within which a trial must  
9 commence.

10 IT IS SO STIPULATED.

11 DATED: June 24, 2014

Respectfully submitted,

12 SHERMAN & SHERMAN  
13 A Professional Law Corporation

14 /s/Victor Sherman

By:

15 VICTOR SHERMAN  
16 Attorney for Defendant  
17 Imran Husain

18 DATED: June 24, 2014

/s/Benjamin Kingsley

By:

19 BENJAMIN KINGSLEY  
20 Assistant United States Attorney

21 ~~(PROPOSED)~~ ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: June 24, 2014

24   
25 HON. RICHARD SEEBORG  
26 United States District Judge  
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